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LETTER REGARDING U S EPA REGION VI COMMENTS ON CLOSURE DOCUMENT FOR GROUND MAINTENANCE YARD NAS FORT WORTH TX
12/18/1997
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

File: 17G
A.F.

NAVAL AIR STATION FORT WORTH JRB CARSWELL FIELD TEXAS

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 361

File: 17A-54
P.W. 361

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

DEC 16 1997

Mr. Mark A. Weegar, Project Coordinator
Federal Facilities Team
Corrective Action Section
Pollution Control Division, MC-127
Texas Natural Resource Conservation Commission
P.O. Box 13087
Austin, Texas 78711-3087

Dear Mr. Weegar:

The Environmental Protection Agency (EPA) has reviewed the document, "Closure Document For Ground Maintenance Yard (AOC 05), Naval Air Station Fort Worth Joint Reserve Base Carswell Field, Texas (formerly Carswell Air Force Base) August 1997".

Based on this review, EPA offers the following comments:

1. This site is listed in the permit documents for Carswell AFB. The permit requires a RCRA Facility Investigation (RFI). Based upon the results of the RFI a site may require additional corrective action or closure. This document does not describe previous investigations at the site in a manner that allows the reviewer to know if the requirements of an RFI have been met. As an example, it does not appear a release determination was done and if a release has occurred, to delineate the release. If the procedures had been followed most of the metals would have dropped out and a determination of site contaminates could have been made which would have limited the number of additional samples to be collected.

2. This report is similar to others (FTA 02 and Aerospace Museum) in which the data is presented without discussion. This document should describe the steps leading to the submittal of a closure document for this site. The document starts by presenting analytical data that I have to assume is Synthetic Precipitation Leaching Procedure (SPLP) results from soils samples. Why was this done? The data presented in Section 2 indicates a limited number of samples contained Arsenic, chromium or lead exceeding background. Based upon those results you could have preceded with only the arsenic, for SPLP analysis. The data on Volatile and Semi-Volatile Organic Compounds, Pesticides and PCBs is only found in Section 6 along with additional discussion on the metals.

Because various investigations have occurred at this site a summary of the data from all investigations and the rational for moving to the next step must be presented in the document.

3. Since you did the SPLP for lead, the results must be addressed. The results indicate lead does leach above the Risk Reduction Standard (RRS) 2, therefore you cannot close this site under RRS 2 and will have to close under RRS 3.

4. Please discuss the reasons for not installing monitoring wells and collecting samples at greater depths.

5. Surface contamination could pose a more serious and direct threat to human health than underground source does. Generally surface soil samples should be collected from a depth of 0 to 6 inches, not 0 to 2 feet. The samples collected are actually composite samples, not grab samples. If contamination is on the surface, then the detected concentration could be only 1/4 of the actual concentration. The outcome may mislead the investigation. This is specially true for herbicides, pesticides or any spilled chemicals. It is recommended that the facility at least shall selectively resample certain locations, up to 0 to 6 inches depth, to either confirm or refute the results.

6. Has the facility established standard operating procedures for sampling surface and subsurface as well as sample handling procedures? The report should include a discussion of how samples were collected and whether the procedures were followed.

7. PART 2. Comparison of Results from the Final SI/SC Technical Report to Background at Grounds Maintenance Yard Under the Section of Ground Maintenance Yard, there is a paragraph discussing pesticides and PCBs. It states, "Arochlor 1254 was detected twice , ...above the TNRCC MSC." What are the concentrations of pesticides? The report should list PCB results.

8. PART 3. Final Report Demolition and Removal of Structures/Disposal of Transformers With PCB Oil at Grounds Maintenance Yard - The report states that there are twenty-three transformers of varying sizes, three were identified containing PCB oil in excess of the maximum limit of 50 ppm. In Appendix C, the Atomus Laboratory report only listed ten transformers. Where are the rest of them? Shouldn't all the transformers be tested?

9. PART 5. Applicable portions of the Final Site Investigation/Site Characterization Technical Report for the Grounds Maintenance Yard - Page 2-7: Table 2-1 listed the analytical test methods including mercury; however, no analytical results of mercury show in Tables 2-4, 2-5, 2-6, and 3-2, nor discussion of mercury has been given. Please explain.

10. Page 4-1, third paragraph: The report states, "The scope of this site investigation was developed to determine the presence of site contaminants that may potentially impact human health **through direct contact with surface soil...**". (emphasized) If the facility is concerned with the direct contact with surface soil, they should collect surface samples at the depth of 0 to 6 inches instead of 0 to 2 feet because people would more frequently contact the soil at top six inches than that of two feet below ground surface.

11. Page 4-4: It reported that several organics exceed TNRCC Risk Reduction Standards. All those chemicals (bis(2-ethylhexyl)phthalate , 4,4'-DDT, 4,4'-DDE, dieldrin, and Aroclor 1254) are pesticides and all were applied to the surface soil. Since the samples were collected from a depth 0 to 2 feet, it is realistical to assume the actual concentration of those chemicals at surface could be four times higher than the values showed in the Table 3-2.

Please contact me at (214)665-8306 should you wish to discuss this further.

Sincerely,

Gary W. Miller

Gary W. Miller
Senior Project Manager
Base Closure Team

cc: Mr. Olen R. Long, (BEC/BTC)
Air Force Base Conversion Agency
Naval Air Station Fort Worth

cc: Mr. Charles A. Rice
HQ AFCEE/ERB

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